

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

DAVID J. BOSHEA,

Plaintiff,

v.

COMPASS MARKETING, INC.,

Defendant.

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Case No. 1:21-CV-00309-ELH

**REPLY IN SUPPORT OF MOTION *IN LIMINE*
TO BAR MATTERS REGARDING THE FIRST TRIAL**

David Boshea, in support of his Motion in Limine to Bar Matters Regarding the First Trial, seeks to clarify the position asserted in the motion. As stated in the initial paragraph of the motion, the entry of the order granting the motion would allow for the admission of testimony presented for impeachment, which would include challenging prior inconsistent statements. Again, as stated in the motion’s first paragraph, to the extent any party refers to testimony provided at the previous trial, counsel shall refer to the trial as the “prior proceedings.”

WHEREFORE, the plaintiff, David J. Boshea, respectfully requests this Court for an order barring counsel and all witnesses from making any reference to the first trial, through argument, or on direct or cross-examination, excepting testimony presented for impeachment, and to the extent a party seeks to impeach a witness, they must refer to the first trial as a prior proceeding or prior proceedings, and for other just relief.

RESPECTFULLY SUBMITTED,

By: /s/ Gregory J. Jordan
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CERTIFICATE OF SERVICE

I certify that on January 24, 2025, David J. Boshea served his Reply in Support of Motion in *Limine* to Bar Matters Regarding the First Trial by CM/ECF on:

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/s/ Gregory J. Jordan
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